R09-20-C-003

CITY OF MT. SHASTA

305 North Mt. Shasta Boulevard
Mt. Shasta, California 96067
(530) 926-7510 • Telephone
(530) 926-0339 • Fax

[redacted]

YEAR-ROUND RECREATIONAL CENTER

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(530) 926-0339 • Fax

While resources have been limited, community and civic leaders hope to take advantages, such as abundant environmental/natural resources, large size and conducive zoning, ready access to infrastructure and transportation (road, highway, rail) corridors, untapped potential for outdoor tourism, and major investment from the public in renovation. This funding will be an important resource allowing municipal leaders to begin to remove economic, environmental, and social barriers that are preventing the goals of community prosperity. The City will enthusiastically engage both community and stakeholders through outreach and the implementation of redevelopment plans previously conducted through brownfields area-wide planning.

1. **Applicant Identification:** City of Mount Shasta, California

2. **Funding Requested**
   a. **Grant Type:** Single Site Cleanup
   b. **Federal Funds Requested**
      i. $600,000.00
      ii. We are submitting a Hardship Waiver Request. This Request is located in Appendix II - 13.b – Hardship Waiver Request.
   c. **Contamination:** Hazardous Substances

3. **Location:** City of Mount Shasta, California

4. **Property Information:** The Landing – Roseburg Commerce Park is a 128-acre brownfield site located at 1901 South Mt. Shasta Blvd., in Mount Shasta, California, 96067. The targeted area will be the former Box Factory.

5. **Contacts:**
   a. **Project Director:**
      Bruce Pope, City Manager
      (530) 926-7510
      bpope@mtshastaca.gov
      305 N. Mt. Shasta Blvd.
      Mount Shasta, CA 96067

   b. **Highest Ranking Elected Official:**
      John Stackfleth, Mayor
      (530) 936-7510
      305 N. Mt. Shasta Blvd.
      Mount Shasta, CA 96067

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6. **Population:** The city serves as the center for regional tourism and is the second largest by population in Siskiyou County, with 3,394 residents within its 3.75 square mile boundary and an additional 3,000 residents living within its sphere of influence.

7. **Applicable Other Factors Checklist:**
   a. The community population is less than 10,000. Noted within the Narrative on page 2 and above in number 6.

8. **Letter from the State or Tribal Environmental Authority:** A letter from DTSC is attached in Appendix I.

Application for the
Box Factory EPA Brownfield Cleanup at
The Landing – Roseburg Commerce Park

Applicant: City of Mt. Shasta

U.S. Environmental Protection Agency

FY20 Brownfield Cleanup Grant Application Draft

Opportunity #EPA-OLEM-OBLR-19-07

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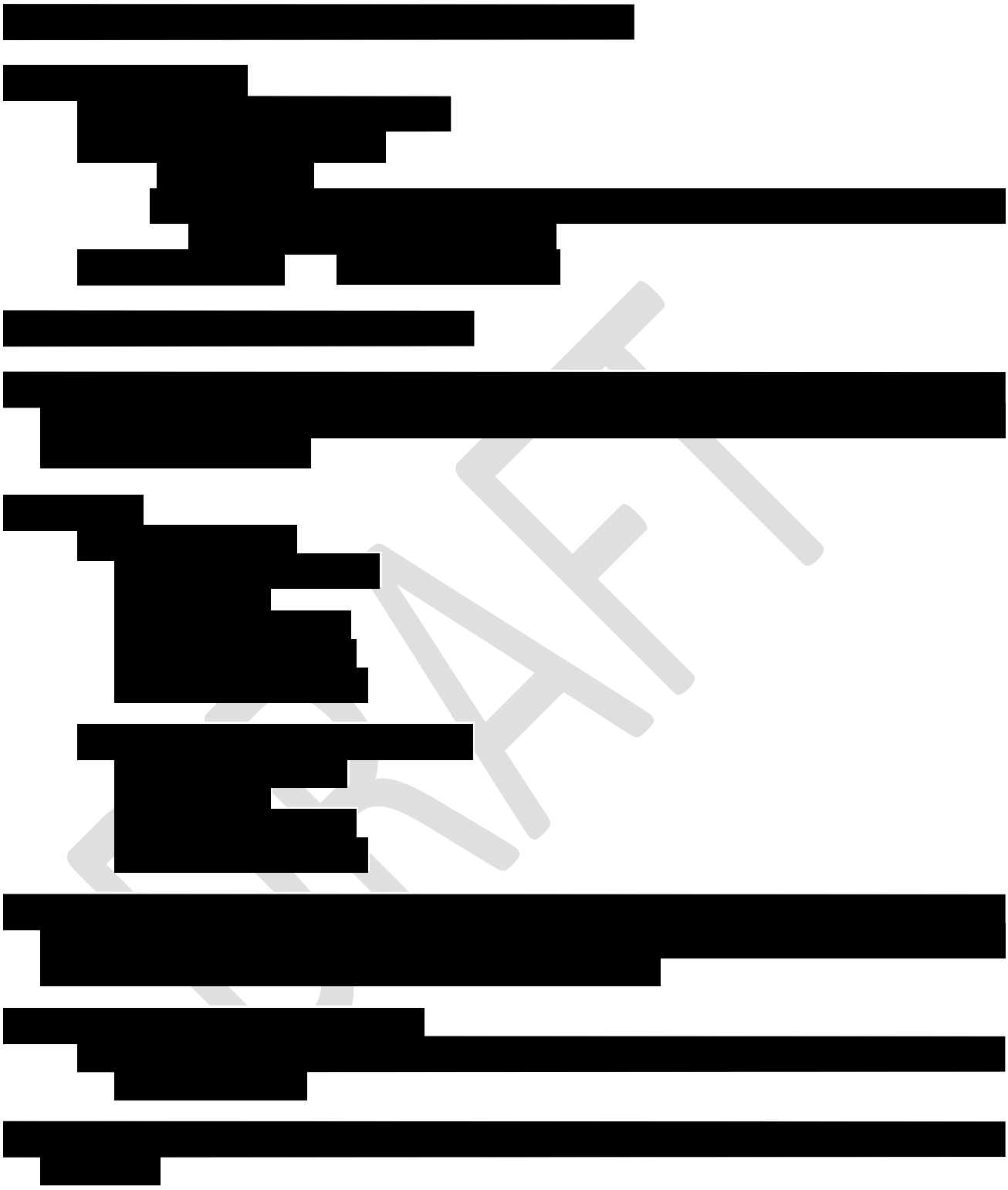


NARRATIVE

1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields

1.a.i. Background and Description of the Target Area

Mt. Shasta is a rural alpine city in Northern California that sits on the southern end of Siskiyou County; the state's fifth largest county in acreage and 33rd in population. The City is the center for regional tourism and is the second largest by population in Siskiyou County, with 3,394 residents within its 3.75 square mile boundary and an additional 3,000 residents living within its sphere of influence. Siskiyou County grew rapidly during the California Gold Rush yet experienced the largest influx of people during the growth of the timber economy in the following century. Mt. Shasta was once considered a vibrant and prosperous place to live, sustained by agriculture, rail, and timber industries. This history is still part of the cultural values and identity of Siskiyou County.

The target area for this cleanup is the Box Factory within the historic mill site recently rebranded as the Landing – Roseburg Commerce Park. The imposition of restrictions on logging in the late 1980's hit Mt. Shasta hard and left large sites like the mill at the Landing empty and an eyesore for the community. Businesses supporting timber and railroad sectors closed, leaving several industrial properties with over 100 years of contamination scattered throughout the area. Since the mill was dismantled, the City has experienced high poverty, an aging workforce, substance abuse issues, declining school enrollment, and youth emigration. Lack of appropriate land for development due to brownfields and surrounding Federal lands impedes prosperity for the community. Adding to these issues, the proximity of the Oregon border often sends businesses or customers north for zero sales taxes incentives, which further damages the City's tax base and is an impetus for developing local businesses that will competitively supply local needs. Despite this, renewed interest in developing the mill site, rebranded as The Landing – Roseburg Commerce Park (Landing), has catalyzed assistance over the last 15 years from EPA, the U.S. Economic Development Administration (EDA), the State of California, and community partners. In particular, the site has been targeted as a prime location for development as a commercial/industrial area with a pedestrian/bike greenway connecting the downtown less than one-mile away to public lands and trails nearby.

1.a.ii. Description of Brownfield Site

The Landing is a 127-acre brownfield with a myriad of contamination issues due to its historic use as a mill. Within the Landing, the target area for this cleanup is the centrally located, 4-acre former Box Factory. Although the former structures were removed, remnants of concrete slabs and overgrown vegetation occupy the target area. Several Phase II assessments since 1988 have characterized Polychlorinated biphenyls (PCBs), dioxins, and furans in shallow soils within the footprint of the former transformer and burner in the Box Factory. Contaminated soil within the former footprints of the Box Factory transformer and burner will be excavated and disposed of at an appropriate facility. To achieve a condition of No Significant Risk, use restrictions/institutional control for containment will be developed facilitating development of the larger 44-acre parcel. The remediation proposed in this cleanup application is consistent with the Analysis of Brownfields Cleanup Alternatives (ABCA; attached), State Required Removal Action Workplan (RAW), and California Environmental Quality Act (CEQA) process vetted by the community (throughout the life of the project) EPA, and the California Department of Toxic Substance Control (DTSC). The remediation techniques selected will protect human health and the environment while catalyzing redevelopment of the entire Landing.

1.b. Revitalization of Target Area

1.b.i. Reuse Strategy and Alignment with Revitalization Plans

The Landing is one of Mt. Shasta's (and Northern California's) largest and most marketable commercial properties, and the County's top economic development priority. As part of the Public Involvement Plan under the 2013 EPA Multi-Purpose grant (BF-00T93701), the City worked with residents and local community organizations to create the Landing Area-wide Plan detailing types of developments and reuse options that

would serve the community. The Area-wide plan included a SWOT analysis, cleanup prioritization, several charettes of the future development, videos, and a string of community meetings. Once completed, these community driven goals and reuse options led to the creation of the Specific Land Use Plan for the Roseburg Commerce Park (Specific Plan) formally adopted into the City Zoning Code. Supplementary planning commission and City council meetings ensured the Specific Plan was developed in accordance with the City Land Use Plan and State requirements. Moreover, the City worked closely with Siskiyou County to align goals, environmental regulations, and policies with the Siskiyou County General Plan (2014), Housing Element (2014), and Land Use Element (1997).

The revitalization and reuse of The Landing less than a mile from downtown will further allow for the preservation of outlying areas and prevent sprawl. This will also reduce the need for automobile transportation and thus reduce further environmental impacts in the area that are enumerated within the Mt. Shasta General Plan and Land Use policies. The cleanup and eventual redevelopment facilitated by this grant will follow and be developed in cooperation with City planning elements, policies and procedures. One example is the emphasis on encouraging sustainable development, energy efficiency, and new developments on the site to preserve greenfields as outlined in the Mt. Shasta General Plan Update 2009-2014. The corresponding Housing Element, Land Use Element, and related guidelines encourage environmental practices such as recycling, emission reductions, green remediation, and green building (LEED, solar, etc.). These policies were developed with specific zoning, building size, and land uses in mind. In the final stage of adopting the Specific Plan, the public was formally provided with an opportunity to comment via the CEQA process. Cleanup and redevelopment will follow the spirit of these policies.

The Specific Plan was developed to allow a progressive mixed-use site that has an attractive location for businesses and visitors while taking advantage of the idyllic alpine setting and dynamic location. Proposed development under this Plan includes both light industrial and commercial uses, an RV Park, performing arts theater office spaces, and an open space/recreation park. The site will not only be connected by roadways, but a greenway trail system leading to habitat and wetland restoration, wildlife viewing opportunities, and wilderness preservation. With a relatively flat topography and centralized location, the planned reuse for the Box Factory will have light indoor industrial uses and a segment of the greenway trail system. Although not located in an Opportunity Zone nor Federally designated flood plain, the cleanup and redevelopment will follow the spirit of economic development and environmental stewardship.

1.b.ii. Outcomes and Benefits of Reuse Strategy

According to preliminary area-wide plans, the Landing will provide 25 acres of greenspace, 25 acres of public space, 50,000 square feet of retail, and 50,000 square feet of office space. Using the building floor space divided by space utilization rates for retail and office sectors, we estimate that approximately 300 jobs will be created after redevelopment. Comparable brownfield redevelopments in Siskiyou have shown an increase in land value and an estimated rise in property and business taxes by approximately 9%, increasing the economic welfare of the community. Taken together, this will assist Mt. Shasta residents by providing them with more funding for services and will make Mt. Shasta a leader in tourism and recreational innovation in the region. By providing more employment opportunities for the youth and citizens of Mt. Shasta, infill development should alleviate poverty and decrease unemployment by 3.4% to the national average.

During cleanup implementation, the project manager will encourage developers and contractors to hire local people to perform redevelopment activities including carpenters, plumbers, electricians, etc. thus providing employment opportunities for locals and minimizing carbon footprints. Once cleaned, the target area will support sustainable business development, foster job growth, and provide non-economic benefits by creating community parks and reducing the public's exposure to possible contaminated soils. One major outcome will be the removal of blight and creation of prime economic opportunities. With existing perceptions of pollution, investment is discouraged, and development is delayed. Brownfields redevelopment in other communities in Siskiyou County has illustrated that companies are willing to move into the region when industrial and commercial land is made available. Bringing former brownfields to development readiness will then increase

economic development and employment and decrease poverty. In particular, the funding of performing arts, parks, and boutique shops should bring in new visitors who will spend money locally.

As stated in Objective 4.10 of the Specific Plan, the City will use this opportunity to promote progressive environmental activities in general and has worked with state and regional energy efficiency organizations to ensure that owners and developers will have access to information regarding programs and funding available to implement energy star, green building designs incorporating LEED principles into the redevelopment designs and facility master planning.

The cleanup will have multiple health and welfare benefits. The first and most important impact will be minimizing the potential for the community to be exposed to contaminants Removing or capping soil will allow community members, especially hikers, bikers, and others to utilize trails and greenspaces without being exposed to contaminants in the soil. Further, improved public welfare and safety is a concern. Local police response calls can run as high as $500 per call. Additionally, the mill is patrolled twice daily for public safety. Reducing response calls and patrols by half would save more than $5,000 per year.

The outcomes of this project will benefit the community by increasing the health and welfare of the residents, decreasing blight conditions, alleviating crime, and creating economic benefit to the community as a whole. With this current blighted location cleaned and developed, the major source of local crime and economic malaise will be removed. The cleanup of these sites should markedly improve the overall health of the region and allow for safe and environmentally appropriate redevelopment.

1.c. Strategy for Leveraging Reuse

1.c.i. Resources Needed for Site Reuse

Civic leaders in Mt. Shasta consider economic development to be a critical foundation to the long-term health and growth of Mt. Shasta. The City of Mt Shasta is eligible to compete for funding from several sources such as State, Federal, and private foundations. Per the Funding Toolkit in the area-wide plan, the City is implementing strategy 4 by applying for this EPA cleanup grant and DTSC Targeted Brownfields Cleanup Grants. With the site fully characterized and contaminants confined to shallow soils, cleanup of adjacent areas are planned for commercial uses and will be cleaned as development ensues.

The City has developed a network alongside strategic community partners to locate and attract these projects and have obtained as much leveraged funding as possible for the betterment of the City. Community partnerships with the Siskiyou Outdoor Recreation Alliance (SORA), City Parks and Recreation District, and the US Forest Service have resulted in trail connectivity projects throughout the Mt. Shasta area. Furthermore, the Box Factory Cleanup will clean the last part of the highly anticipated greenway along the western edge of the property. The City has identified funding sources such as the U.S. Federal Emergency Management Agency (FEMA), EPA, California Water Resource Control Board, California Conservation Corps, California Department of Fish and Wildlife, California Department of Conservation, and the California Statewide Park and Recreation Development funding available through Proposition 68 as funding sources for open space conservation, greenway construction, bioswale implementation, and environmental education. Similar efforts through local community partners, private foundations, and US Forest Service are currently leveraging these dollars for similar trail connectivity and environmental resilience projects.

As of August 2019, the City was awarded a U.S. EDA grant to develop and implement financing opportunities to incentivize infrastructure, site preparation, and beautification of the Landing. Through this grant, a combination of financing options such as Tax Increment Financing, Enhanced Infrastructure Financing District, Business Improvement District, and a Mello-ruse District will be developed within the next 18-months. In addition, the City hopes to complete a market analysis for the Landing under the EDA grant and renovate marketing materials developed during the 2013 EPA Multipurpose Grant to coincide with cleanup efforts and ongoing infrastructure updates.

Addressing the infrastructure updates are City Public Works staff in conjunction with two engineering fellows from the Governor's Initiative AmeriCorps program, CivicSpark. The City provides partial funding matched

by the CivicSpark program to address emerging environmental and social equity resilience challenges for water and sewer upgrades at the Landing. Leveraging the work of these fellows, the City has identified opportunities through USDA, California Climate Tax Incentives, and U.S. Department of Transportation (DOT) Infrastructure for Rebuilding America (INFRA) grants to fund infrastructure upgrades. The local electric utility, Pacific Power, has recently upgraded substations connected to the target area. Moreover, both Pacific Power and the California Air Resource Board (CARB) provide grants for electric utility improvement projects and electric vehicle charging station construction.

With remediation still needed, the City has not yet secured leveraging for reuse funding. However, as demonstrated in the current EPA Cleanup Grant, the City was able to leverage the award to obtain a $35,000 DTSC grant for remediation and a $99,500 U.S. EDA grant to develop financial incentives for infrastructure and reuse of the site as mentioned above.

1.c.ii. Use of Existing Infrastructure

Located less than one mile from the downtown, the site has a high level of infrastructure with power, water, sewer, and broadband nearby. Pacific Power, the local utility, provides some of the lowest wholesale power rates on the West Coast. Power at the site includes connectivity to an 8-megawatt substation, sufficient for most moderate-sized commercial, residential, or public developments. While the property does not currently connect to sewer and waterlines, upgraded 6-8" water and sewer stubs are located at the northern extent of the property. Due to a past U.S. EDA grant, the sewer and water infrastructure was upgraded to handle any major industrial uses on the site, further reducing the cost for redevelopment. The City is served by high-speed broadband service and should be able to accommodate all but the most data-intensive industrial facilities on the site. Connectivity to broadband is available at the southern perimeter of the property boundary.

The position of the Landing approximately midway between San Francisco and Portland along Interstate-5 gives the site an ideal location for the delivery and warehousing of goods on the West Coast. Both locations are less than 400 miles from Mt. Shasta, while Los Angeles and Seattle are 600 miles or less. At the south end of the property, state highway 89 leads to Reno, NV approximately 200 miles away. Moreover, the Union Pacific rail line forms the western edge of the property and spurs could be constructed on site. Alternatively, goods can be brought to the rail way station less than 10 miles south in Dunsmuir, CA. The City is within the sphere of influence of several major ports, sitting within a few hundred miles of major ports in Oakland and Seattle, and nearer to small ports such as Eureka and Coos Bay. The relative proximity of these ports, and the central position of the site between them, indicate that the site can serve as both a factory to send goods overseas or as a warehousing for those ports. Several small airports providing commercial and industrial transportation are located throughout Siskiyou County while Sacramento, San Francisco, Portland, and Reno, service full-scale international air transportation within 5 hours.

The relatively flat topography of the Landing and existing road by the Box Factory eliminates any uncertainty regarding access for cleanup and future use for roads and building construction. Routine maintenance of the existing roadways has occurred through several assessment grants, cleanup grants, use of the roadways by public works, use by city police patrols, and the regular vegetation/fuels reduction work. By prioritizing the centralized Box Factory for cleanup, reuse of the site will provide initial investors with the best views of Mt. Shasta and prepare these existing infrastructure assets to finally be connected.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need

2.a.i. The Community's Need for Funding

As a rural community with a small population, Mt. Shasta is unable to tap into the dollars and resources available to larger population centers. Funds generated through increases in general funds, fees, taxes (e.g., sales, property, special taxes, or assessments) are extremely difficult to obtain due to the small populations and smaller number of local businesses. Mt. Shasta is then forced to focus solely on basic services (such as public safety and infrastructure) and seek alternative funding for community and economic development activities. Mt. Shasta is struggling with a small staff, layoffs due the recession, and loss of tax base due to abandoned

properties. Money raised by the City must go to basic services- schools, fire, and police. Public health service needs strain the county budget to an unprecedented level, and we do not have the resources or tax base to fund Brownfields activities.

Mt. Shasta has a 15% commercial vacancy rate for many years according to City Planning officials, which depresses the local economy and hurts property values of nearby businesses. At the same time, lower tax revenues and high poverty at 52% higher than other census tracts in California continue to slow economic growth (CalEnviroscreen). Along with these economic hardships, the City is unable to compete for development interest with urban centers capable of providing discretionary development incentives. Moreover, with the natural beauty of Mt. Shasta comes the unanticipated environmental factors including annual fire threat and severe winter storms destroying infrastructure and requiring the city to provide extended services. In January 2017, snowfall exceeded 4 feet causing damage from the debris fall and flooding causing permanent damage to city streets and drainage systems with an estimated $1 million cost to the city.

At present, the City has been unable to successfully market brownfields with remaining contamination resulting in increased trucking costs for proper disposal and lacking economic development incentives. As long as The Landing (127 acres, or 5.3% of land within the City) remains vacant it drags down the local economy and hurts our community due to lost opportunity costs and increased public cost. The City does have investors, an ability to invest its own funds, and businesses interested in The Landing, but is desperate for cleanup to allow investment to truly begin.

2.a.ii. Threats to Sensitive Populations

2.a.ii.(1) Health and Welfare of Sensitive Populations

A relatively large share of Siskiyou County's population surrounding Mt. Shasta is categorized as sensitive or at-risk compared to state and national figures (Table 1). Sensitive populations include minorities, children, pregnant women, seniors, those with a disability, on public income assistance, on food stamps/SNAP, and/or without health care coverage (Table 1). According to the American Community Survey, Mt Shasta nearly doubles the state average number of households with children under the age of 18 at 46%; or 20% of the population is 17 years of age or younger (ACS 2013-2017). The Median Household income is $38,848 with over 20% of households in Mt. Shasta live below the poverty level (ACS 2013-2017). The senior demographic of ages 65 and older comprise of 16.3% of the Cities population; nearly double state averages of at 9.1% (ACS 2013-2017). With the target area near downtown, these sensitive populations encompass a significant percentage factors illustrate a community in need of investment and a way forward.

Table 1: A Larger Sensitive Population Locally Compared to State and National Averages

	Mt. Shasta City	Siskiyou County	California	National
Population with disability	24%	19.5%	10%	12%
Public Income Assistance	11.9%	15.6%	9.3%	7.3%
No Health Care Coverage	14.7%	15.5%	17.8%	14.9%
Elderly Poverty Rate:	15.4%	10.0%	9.9%	9.4%

1 Data is from the 2010 U.S. Census data and is available at http://www.census.gov/.

2.a.iii (2) Greater Than Normal Incidence of Disease and Adverse Health Conditions

Environmental and economic issues aggravated by brownfields sites have health, welfare, and economic impacts on Mt. Shasta and beyond. Significantly higher levels of diseases in health status indicators of Mt. Shasta and greater Siskiyou County are twice as high as California and National averages (2012 CA Public Health Report). Known pollutants, cumulative exposure risks, and corresponding local disease occurrence suggests Siskiyou County and Mt. Shasta brownfields have negatively impacted the health of the targeted community. More directly, 2012 California Public Health data shows Siskiyou County has the largest crude death rate among all California counties (double the state average) and the second largest rate of cancer deaths in the state (2012 CA Public Health Report). Further, rates of chronic liver disease are double state and national

averages suggesting long-term environmental pollution impacts on residents. All of this is likely connected to numerous brownfields throughout Siskiyou County and cumulative impacts.

2.a.ii (3) Disproportionately Impacted Populations

A relatively high percentage of residents in Mt. Shasta have disabilities or require public support compared to the national average, further straining the economy (Table 1). Similarly, rural and isolated populations are disproportionately impacted due to limited mobility. While there are two health centers in the county, distances (sometimes more than an hour from rural cities) make reaching hospitals more of an issue. A relatively high percentage of residents in Mt. Shasta have disabilities or require public support compared to the national average, further straining the economy (Table 1). According the EPA EJScreen, Mt. Shasta ranks in the 50-60th percentiles for wastewater discharge, lead paint, and superfund proximity. Impoverished communities are likely to have a higher incidence of pollution and associated health and welfare issues. By cleaning the target area, reuse will remove contaminants from the upper Sacramento watershed, provide employment opportunities to raise household incomes, and provide additional opportunities for healthy activities via the greenway.

2.b. Community Engagement

2.b.i Project Partners & ii. Project Partner Roles

The following list of partners have been identified through previous brownfield outreach engagements, separate collaborative projects within the greater Mt. Shasta area, and routine engagements in public meetings, notices, and direct communications. Partners will be engaged once cleanup is completed.

Organization	**Contact**	**Support Type Role/Responsibility**
Siskiyou County Economic Dev. Council (SCEDC)	Tonya Dowse 530.842.1638	Provide brownfield grant management expertise; Development of business attraction/marketing strategies; Assistance with the establishment of economic development incentives.
Siskiyou Training and Employment Program	Joan Zarzynski 530.938.3231	Community gathering expertise; translations assistance; employment assistance to future businesses on the site.
College of the Siskiyous (COS)	Stephen Schoonmaker, Ed. D. 530.938.5200	Outreach and engagement with students interested in staying in the area. Workforce Development and training opportunities for gainful employment
Jefferson Economic Development Institute (JEDI)	Nancy Swift 530.926.6670	Assistance with business attraction, development and expansion for the site.
Mt. Shasta Chamber of Commerce	Kaila Burns 530.926.4865	Community leader providing input on community goals and enhancements.
Mt. Shasta Open for Business	Larry Stock 530.926.4500	Provide input on businesses to attract and partner with existing businesses.
Discover Siskiyou (Tourism Business Improvement District)	Niki Brown 530.842.	Technical support in current tourism trends, designs, and marketing tactics.
Siskiyou Outdoor Recreation Alliance (SORA)	Laurel Harkness	Expertise in sustainable outdoor recreation planning, community connectivity, public stewardship, and resource development for greenway planning.

City of Mt. Shasta Recreation Department (Non-City Entity)	Shannon	Advisor and partner in vision, maintenance, and long-term goals of greenway.

2.b.iii. Incorporating Community Input

The City will develop a community involvement plan that incorporates interaction with the public through meetings, public notifications, and marketing materials. Communication will include project kick-off meetings, quarterly reports to the city council, periodic progress updates and will include several meetings with stakeholders (Chamber of Commerce, County Board of Supervisors, etc.). These meetings will obtain broad community feedback and target the needs of sensitive populations such as those with low-income, women, transients, migrants, and minorities. Specifically, progress updates will utilize the current [redacted] website, social medial (Facebook, Twitter, City websites etc.), Newspaper, Radio, TV Stations, and the ACRES database. Public input is routinely noted within the communication plan via notes from conversations, notes at public meetings, and archived email correspondence. The project manager and City staff review the public input and respond to individuals or groups via telephone, email, or in person meetings as soon as they are received. This ongoing process of public input has occurred throughout the lifetime of the Landing and will continue until reuse is completed. These communication methods have been shown to be effective in involving Mt. Shasta citizens through previous brownfield grant community activities and should be effective again. The majority of citizens in Mt. Shasta speak English as their primary language, but the City has contacted the Siskiyou Training and Employment Program (STEP) to assist with translation or language services when necessary.

3. TASK DESCRIPTIONS, COST ESTIMATES & MEASURING PROGRESS

3.a. Proposed Cleanup Plan

Historically, the Landing has had several assessments dating from May 1998, to the most recent assessment in November 2014. Over the course of these assessments, full site characterization has been completed with the concurrence of both EPA and the State Department of Toxic Substance Control. Contaminants of concern (COC) present in the soil at the Box Factory transformer and burner areas currently exceed state and federal regulatory standards for human health. Assessments of the vertical and lateral extent of contamination for the Transformer Area show samples exceeding Regional Screening Levels (RSLs) for PCBs (Aroclor 1254 and 1260) in shallow soils. Assessments of the burner site exceed the RSLs for dioxins and furans (TCDD Eqs) within the former footprint. In its current state, potential exposures within the Box Factory at near-surface soil could result in unacceptable lifetime incremental cancer risks for recreational and commercial receptors.

Public input and regulatory oversight agencies concur with the selected Alternative within the Analysis of Brownfields Cleanup Alternatives (attached), the RAW, and state required CEQA process that excavation, removal, backfill, and use restrictions/institutional controls would be expected to reduce potential exposures and risks in the target area. As documented, approximately 1,362 square feet of PCB contaminated soil will be excavated to a depth of 1 ft bgs at the transformer site and approximately 3,880 square feet of dioxin and furan contaminated soil will be excavated to 3 ft bgs at the burner site. Contaminated soil, characterized as non-hazardous for landfill purposes will be removed from the site and disposed of at either the Recology Ostrom Road Facility in Wheatland, CA or the Waste Management Anderson Landfill Facility in Anderson. Supplementary administrative or engineering controls utilized in the form of redevelopment of the site by capping and/or a deed restriction in the form of an Activity and Use Limitation (AUL) may be employed to eliminate the potential exposure pathways. These recommendations were selected after an in-depth analysis of the specific contamination characteristics and the proposed uses by the City of Mt. Shasta. Practicality of cleanup activities was determined along with feasibility and technical aspects of the process to conform with the Roseburg Commerce Park Land Use Plan for light industrial and greenway redevelopment.

3.b. Description of Tasks/Activities and Outputs

The City has modeled the following tasks, schedule, task lead, outputs, and budgetary estimates based on the 2019 EPA Old Mill Central Cleanup Grant cost estimates received from QEPs (adjacent cleanup on the Landing).

Task/Activity 1: Project Management and Reporting

i. Project Implementation

- EPA-funded activities in this task are related to developing the general overall approach to cleanup activities, regular reporting, fiscal administration, and a final report. The task also includes:
  - General project management - oversight, record keeping, financial management, and collaboration
  - Staff Training/Travel - attendance at Brownfields conferences/trainings
  - Contractor Procurement – the procurement of a QEP to perform the sampling, analysis, and cleanup work on this site through the same process (completed within 3 months of award)
  - Contractual agreements with consultants and DTSC for state oversight and services (~6 months)
  - Coordinating cleanup completion certification approved by both EPA and DTSC.
  - Quarterly reporting elements: Summary of Successes/Challenges, Assistance Needed from EPA, Narrative Update, Cumulative Expenditures
  - Regular Reporting of Disadvantaged Business Enterprise (DBE), FFR-425, etc.
  - Data entry of project updates into ACRES Reporting (as new data is available)
  - Final Report with goals, performance, leveraged funding, and deviations (if any)

ii. Anticipated Schedule: *Start*: Sept. 2020 *Completion:* Sept. 2023 (life of grant)

iii. Task Activity Leads: City of Mt. Shasta requesting information from the project manager and QEP

iv. Outputs: The anticipated output include RFP/RFQ procurement documents; Contractual agreements with consultants and Voluntary Cleanup Agreement with DTSC for state oversight and services; a report describing the project regulatory oversight plan, applicable fees, and points of contact for the regulatory agency; participation in at regional and national conferences/training.

v. Budget: The total budget for this category will be $51,000. Funds will be used for a) Attend workshops and conferences, airfare, lodging, per diem (3 x $1,500 = $4,500); b) Supplies @ $ 1,500: copies, postage, phone, newspaper ads; c) Contractor procurement, contracting, distribution (100hrs at $50/hr = $5,000; d) Project Management (160hrs at $50/hr = $8,000); e) Routine Project Reporting ((10 hrs a quarter for 3 year plus time for annual reporting)150 hrs at $50/hr = $7,500); f) produce final report (60hrs at $50/hr = $3,000); g) City Personnel Project Management (130hrs at $50/hr=$6,500); h) DTSC Voluntary Cleanup Agreement (2019 cost ~$10,000-13,000); i) QEP reporting assistance estimated at $5,000. *Cost share* under this category includes City Personnel at $6,500, plus the VCA at $10,000, plus $1,500 for supplies, and a $1,000 share of the contractual costs totaling $19,000.

Task/Activity 2: Community Outreach

i. Project Implementation

- EPA-funded activities in this task are dedicated to public involvement and community outreach to involve the community in the brownfield's cleanup preparation, cleanup process, and engage community partners in redevelopment. This task will cover the costs associated with outreach such as human resources; advertising, meetings spaces, presentation materials, and website maintenance, etc. The community outreach will include public meetings, one-on-one meetings with developers and stakeholders, community advisory groups, developers, city staff and elected officials. Periodic updates of the project are anticipated quarterly at public meetings and virtually via electronic news updates. EPA recognition on materials produced by the grant and EPA Project Officer invitation to attend public meeting. The task includes:
  - Public Meetings, presentation materials, and handouts
  - Routine website maintenance and project updates on the current website
  - Comments received from public participants
  - Communications plan tracking public meetings, discussions, and a list of stakeholders

ii. Anticipated Schedule: *Start*: Sept. 2020 *Completion:* Sept. 2023

iii. Task Activity Leads: Procured Project Manager & City Personnel

iv. Outputs: Quarterly Project Updates (12 over the grant lifetime); stakeholder meetings/correspondence; media updates both electronically and physically; presentation materials

v. Budget**:** The total budget for this task is $36,000. Costs include: a) City Personnel Time for Outreach (250hr x $50= $12,500); b) $4,000 travel to meetings and conferences; c) Supplies totaling $2,000 for signs, mailings, posters, website, factsheets; newspaper add; d) Project Management for presentations, edits, media, meeting etc. (350hr x $50 = $17,500). The *cost share* will include City Personnel at $12,500, plus $2,000 for supplies, plus $16,000 in contractor costs totaling $31,000.

Task/Activity 3: Cleanup Planning

i. Project Implementation

- EPA-funded activities in this task will cover project manager and QEP costs for creation of pre-cleanup documentation, permitting, and all preparations. This was estimated using the approved cleanup planning documents (Final ABCA, RAW, Quality Assurance/Quality Control Plan (QAP), Sampling and Analysis Plan (SAP), Transportation Plan, and Mitigation Measures) cost estimates from the 2017-2020 cleanup cost estimates on an adjacent site. The task also includes:
    - Addendum to the ABCA to address changing climate concerns
    - Review of mitigation measures and permitting requirements from the California Department of Fish and Wildlife, California Regional Waterboard, State Historic Preservation Office, City Grading Requirements, and other agencies as applicable
    - State Closure Letter/No Further Action Letter

ii. Anticipated Schedule: *Start*: Mar. 2021 *Completion:* Sept. 2022

iii. Task Activity Leads: Procured Project Manager & QEP

iv. Outputs: Documentation addressing Changing Climate Concerns to ABCA; permitting documents required for cleanup implementation; State Closure Letter/No Further Action

v. Budget: The total for this task is $50,000 for the Project Management to update the ABCA (20hrs at $50hr=$1,000) and QEP for pre-construction & permitting including SAP/QAP @ $24,000; Grading permit @ $6,000; CDFW Agreement & biological surveys @ $15,000; Transportation @ $4,000; the *cost share* will be $0.

Task/Activity 4: Cleanup Implementation

i. Project Implementation

- EPA-funded activities in this task will cover environmental contractor costs for implementing the approved RAW to ready the property for redevelopment. Excavation, transport, and testing is for the entire Box Factory. Use restriction and institutional controls are applied to the 40-acre parcel where the Dump Area and Box Factory are located. This work will be conducted with applicable state and federal agencies. Tasks:
    - Excavation of approximately 1,000 cubic yards and removal to a permitted facility
    - Confirmation Sampling in areas where soil is removed in accordance with the final RAW.
    - Implementation of institutional controls/use restriction- Soil Management Plan; Survey; Deed
    - Removal Action Cleanup Report (RACR) – cleanup activities will be described in the RACR

ii. Anticipated Schedule: *Start*: Sept. 2022 *Completion:*July 2023

iii. Task Activity Leads: Project Manager & QEP

iv. Outputs: **Final cleanup of the former Box Factory**; Subsequent reports on cleanup activities and suitability of development on-site; City, Grant Administrator, and QEP will track these developments and monitor so no unapproved developments or changes will occur to the site.

v. Budget: A total of $461,000 is budgeted for this task including excavation, stockpiling, confirmation samples, safety equipment, etc. ~$130,000 (based on per 2019 estimate); at soil loading, transport and disposal $200,000 (Class 2 landfill at $250 per ton ~750 tons=$187,500 plus markup); lab testing at $8,000 per 2019 estimate; backfill & testing at $15,000; plus, the cost estimate for survey and use restriction of Option 3 in the ABCA at $30,000 (entire parcel is 40 acres, survey and deed draft); plus development and implementation of

soil management plan/capping as needed $68,000; plus Contract Management estimated at 200hrs at $50/hr = $10,000. The *cost share* total will be $50,000.

3.c. Cost Estimates

A detailed cost estimate is provided under each task in section 3.b.v. above. The budget below is for excavation and removal of hazardous substances at the Box Factory and implementation of institutional controls. Funds remaining post cleanup of the target area will be utilized to remove hazardous substance contaminated soils from adjacent sites within the Landing.

Budget Categories		**Hazardous Substance Project Tasks ($)**				**Total**
		Project Management and Reporting	Community Outreach	Cleanup Planning	Cleanup Implementation	
Direct Costs	**Personnel**	$6,500	$12,500	$0	$0	**$19,000**
	Fringe Benefits	$0	$0	$0	$0	**$0**
	Travel	$4,50	$4,000	$0	$0	**$8,500**
	Equipment	$0	$0	$0	$0	**$0**
	Supplies	$1,500	$2,000	$0	$0	**$3,500**
	Contractual	$40,500	$17,500	$50,000	$461,000	**$569,000**
Direct Costs		$34,000	$5,000	$50,000	$411,000	**$500,000**
Indirect Costs		$0	$0	$0	$0	**$0**
20% Cost Share (Waiver Submitted)		*$19,000*	*$31,000*	*$0*	*$50,000*	***$100,000***
Total Budget		**$53,000**	**$36,000**	**$50,000**	**$461,000**	**$600,000**

3.d Measuring Environmental Results

A project manager and QEP procured by the City will need to demonstrate expertise in overall grant management services including but not limited to, routine audits, financial tracking systems, and policies for reporting. Moreover, contracts for procured firms are written ensure environmental cleanup results are achieved through a Master Service Agreement whereby consultants provide a scope of work, detailed cost estimate, and timeline for completion of each tasks. The City will utilize existing accounting systems to track grant funds. The "outputs" of the grant will be measured by total cleanup conducted (cubic yards of contaminated soil removed), completed reporting requirements, concurrence reports from oversight agencies, and level of community involvement. Routine ACRES updates will occur during the cleanup and after the project is completed be completed by City staff. SEDC routinely provides updates on changing economic factors and can provide jobs created, businesses attracted, and tax/property base rates over time. At the completion of this project the amount of land set aside for greenway and trail miles may be used for future accomplishments and funding leveraged. The outcomes and outputs of the grant will be tracked by City staff that has experience working on grants with diverse agencies.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Programmatic Capability

4.a.i. Organizational Structure & ii. Description of Key Staff

The City of Mt. Shasta is governed by a five-member, elected city council. The council is active and engaged in all aspects of city government, including the existing brownfields program. As a priority project for the City, the experience gained from the ongoing work with the EPA brownfields program in Mt. Shasta has built a high level of knowledge and expertise with staff and contractors. Three separate brownfields projects ongoing in the City have given the City a depth of understanding of the financial and contractual demands of these grants and will create efficiencies in this next project due to knowledge of the program, built-in partnerships, and established basic cleanup plans. These grants have fostered strong community organization and

connections with the public, and this knowledge will be necessary for administering and overseeing this cleanup grant.

Bruce Pope, City Manager, Muriel Howarth-Terrell, Public Finance Director, and Juliana Lucchesi, City Planner will oversee the management system that will be in place to facilitate the successful completion of the Brownfields cleanup program on behalf of the City of Mt. Shasta. The City Manager has served the City for nearly 3 years successfully providing oversight of the 2016 EPA Cleanup and spearheads the redevelopment of the Landing. With over 15 years of experience at the City, the Finance Director's expertise and a demonstrated track record for programmatic, administrative, and financial tracking guidance throughout the duration of four EPA brownfield grants and several other federal and state grants will lead to the success of this project. The City Planner has demonstrated 3 years of expertise in public engagement, land use, and city policies will ensure the Project continues with support from the community and in compliance with both State and Local policies as reuse occurs. Monthly and bi-monthly meetings between staff and contractors has ensured the timely success of the grants listed below in 4.b.i. Moreover, draft documents from reporting, to procurement, contracting, and an itemized list of cleanup procedures are ready and awaiting to be revamped for this highly anticipated cleanup.

4.a.iii. Acquiring Additional Resources

The City plans to procure a project manager and environmental contractors (QEP) within the first 6 months using EPA procurement guidelines to add the necessary capacity to facilitate the project. Procurement procedures as documented in previous and current grants demonstrates the City is fully capable of meeting Good Faith practices, including 2 CFR 200.317-326. The chosen consultants are required to have expertise in brownfields and established protocols for grant administration, financial tracking, and implementation. The City maintains a list of several project management consultants and QEPs experienced with the Landing over the last several years. These consultants have been extensively involved in both brownfields implementation, planning, and redevelopment of the Landing through 12 different brownfields grants awarded by DTSC or EPA. Monthly meetings with consultants and regular communications will ensure the project stays on task and on time. The City will utilize existing accounting systems and experience with ACRES to track grant fund accomplishments in coordination with project manager and QEP. As demonstrated in past grants, the City will consult with EPA, DTSC, and the Center for Creative Land Recycling (CCLR) for technical assistance when needed.

4.b. Past Performance and Accomplishments

4.b.i Currently Has and Previously Received an EPA Brownfield Grant

The City of Mt. Shasta has been the recipient of multiple brownfields grants, most recently a Brownfields Cleanup Grant (BF-99Y45801) from 2016 to present for $240,000 and a pilot Multi-purpose grant (BF-00T93701) from 2012-2016 for $440,000. These grants have gone far to finish assessing the entire Landing and prepare it for cleanup and redevelopment. The 2016 Cleanup grant is on track to meet all its accomplishments within the allocated funding (including cost share) by Oct. 2020 with ACRES updates anticipated for Summer 2020 after completion of excavation. The expended funds (~$40,000) have been used primarily for coordination with DTSC via a Voluntary Cleanup Agreement, completion of the RAW, completion of the CEQA Process, Procurement, and updates to the ABCA. Unexpended funds total about $200,000 and will be used by the end of the grant for pre-construction permitting and implementation; scheduled to occur between Dec. 2019 and end Sept. 2020. At the completion of the open grant, an additional 12 acres of the property, including another segment of the greenway trail, will be ready for redevelopment. The Multipurpose Assessment Grant was completed within the allocated budget with a one-year extension. Leading to the current cleanup request, the 2012 Multi-purpose grant conducted Phase II assessments at the Box Factory, Dump, and New Mill Equipment shed areas of the Landing. In addition to Phase II assessments, an ABCA, and RAW were completed. The Multi-purpose grant also excavated approximately 900 cubic yards of petroleum contaminated soil from the nearby Equipment Shed. Both grants demonstrate the city's ability to comply with timeliness for ACRES reporting, achieving grant deliverables, and fiscal responsibility.

APPENDIX I –LETTER FROM THE STATE ENVIRONMENTAL AUTHORITY – CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCE CONTROL

Department of Toxic Substances Control

Jared Blumenfeld
Secretary for
Environmental Protection

Meredith Williams, Ph.D.
Acting Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Gavin Newsom
Governor

November 25, 2019

Ms. Noemi Emeric-Ford
US EPA Region 9 Brownfields Program
Southern California Field Office
600 Wilshire Blvd., Suite 1460
Los Angeles, California 90017

STATE OF CALIFORNIA LETTER OF ACKNOWLEDGEMENT FOR BROWNFIELDS GRANT APPLICATION FOR THE CITY OF MOUNT SHASTA

Dear Ms. Emeric-Ford:

The Department of Toxic Substances Control (DTSC) of the California Environmental Protection Agency (Cal/EPA) acknowledges and supports the City of Mount Shasta's application for a U.S. Environmental Protection Agency (U.S. EPA) Brownfield Cleanup Grant for Roseburg Commerce Park. The site was once a major lumbermill and the City's largest employer and main economic driver but is now vacant and has been owned by the City of Mount Shasta since 1989.

DTSC is one of the lead regulatory Agencies with responsibility for overseeing the investigation and remediation of hazardous substances release sites in California. Through various initiatives, DTSC works cooperatively with state and local agencies, private entities, and communities to facilitate brownfield reuse and achieve cost-effective remediation solutions, while safeguarding public health and the environment. DTSC has worked cooperatively with numerous stakeholders throughout California, assisting with redevelopment and reuse plans for hazardous substances and petroleum release sites in our state.

DTSC fully supports the City of Mount Shasta's efforts to apply for and obtain a Cleanup Grant to address contamination at the Roseburg Commerce Park in the amount of $500,000. The City of Mount Shasta was greatly impacted by the restrictions on logging in the late 1980s, leaving large mill sites vacant and creating an eyesore for the community. The area proposed for cleanup has been impacted by dioxins/furans and polychlorinated biphenyls (PCBs). Cleanup of this area will allow for redevelopment into a light commercial development site, sparking redevelopment of adjacent areas for planned park and green space uses.

The City of Mount Shasta is the recipient of several Targeted Site Investigation and U.S. EPA Brownfield grants dating back to 1998 and has several Voluntary Cleanup Agreements with DTSC. DTSC fully supports the City of Mount Shasta's application for the U.S. EPA Cleanup Grant.

This grant will allow the City of Mount Shasta to work with State Agencies in a productive manner that protects the environment, improves the lives of the citizens of the area, and enhances the Roseburg Commerce Park. We appreciate the opportunity to support local agency programs because they play a critical role in California's effort to protect the environment and public health.

If you have any questions, please contact Ms. Leona Winner at (916) 255-6679, or via email at Leona.Winner@dtsc.ca.gov.

Sincerely,

Steven Becker, P.G., Chief
Santa Susana Field Laboratory and Northern California Schools Branch
Site Mitigation & Restoration Program
Department of Toxic Substances Control

cc: (via email)

Ms. Leona Winner
Senior Environmental Scientist
Site Mitigation & Restoration Program
Department of Toxic Substances Control
Leona.Winner@dtsc.ca.gov

APPENDIX II – THRESHOLD CRITERIA RESPONSE

1. Applicant Eligibility: The City of Mt. Shasta is a general-purpose unit of local government, an incorporated City in the State of California.
2. Previously Awarded Cleanup Grant: The Landing is a 127-acre brownfield that hosted several uses over its 125 years of operation as a mill site. The targeted Box Factory has not received cleanup funding to date. Historic assessment grants and multipurpose grants contributed to site characterization and cleanup planning.
3. Site Ownership: The city of Mt. Shasta is the sole owner of The Landing site specified in this application and has owned the site for 26 years. The Landing is the rebranded name for the larger mixed-use development. The Box Factory is centrally located within the Landing on a 44-acre parcel. The City will maintain ownership throughout the life of this grant.
4. Basic Site Information
    a. Name of the site: The Landing - Roseburg Commerce Park – former Box Factory and Dump Area are the targeted cleanup locations.
    b. Address: Approximately 2329 S. Mt. Shasta Blvd., Mt. Shasta, CA 96067
    c. Site Size: The Landing is approximately 127-acre site split into several parcels. The 4-acre Box Factory is located on a single 44-acre parcel within the Landing.
5. Status and History of Contamination
    a. The target area is contaminated by hazardous substances.
    b. Operational History and Current Use(s): The site was first developed by the Pioneer Box Company in 1900. Lumber mill operations were reportedly conducted by several parties, most recently Roseburg Forest Products (RFP), at the site from 1900 until the late 1980's. Historic operations included 2 Mill Sites, a Box Factory, and log pond. The target area for this cleanup is the former Box Factory. There are no current uses with the exception of unsanctioned itinerant camping and unsanctioned recreational use of the site by hikers, bikers, and runners.
    c. Environmental Concerns: Several Phase II assessments since the 1988's have characterized Polychlorinated biphenyls (PCBs), dioxins, and furans in shallow soils within the footprint of the former transformer and burner in the Box Factory. Contaminants of concern (COC) present in the soil at the Box Factory transformer and burner areas currently exceed state and federal regulatory standards for human health. Assessments of the vertical and lateral extent of contamination for the Transformer Area show samples exceeding Regional Screening Levels (RSLs) for PCBs (Aroclor 1254 and 1260) in shallow soils. Assessments of the burner site exceed the RSLs for dioxins and furans (TCDD Eqs) within the former footprint. In its current state, potential exposures within the Box Factory at near-surface soil could result in unacceptable lifetime incremental cancer risks for recreational and commercial receptors.
    d. Contamination is a result of over 100 years of timber operations, multiple owners, and lack of knowledge regarding contaminants during early operation (1890s-1980s). Contaminated surface and subsurface soils are primarily concentrated in areas of historical site facilities. Approximately 1,362 square feet of PCB contaminated soil will be excavated to a depth of 1 ft bgs at the transformer site and approximately 3,880 square feet of dioxin and furan contaminated soil will be excavated to 3 ft bgs at the burner site.
6. Brownfield Site Definition
    a. The site is not listed on the National Priorities List
    b. The site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial decrees issues to or entered into by parties under CERCLA
    c. The site is not subject to jurisdiction, custody, or control of the United States government.

7. Environmental Assessment Required for Cleanup Proposals: A Phase II site assessment report has been completed for this site prior to submission. Several assessments have been completed, including 1) 1998 and 2005 EPA Targeted Site Assessments analyzing soil and groundwater for petroleum hydrocarbons, volatile organic compounds, dioxins/furans, and metals; 2) 2007 DTSC Targeted Site Investigation Phase II Report analyzing PCB contamination at the Box Factory transformer; and 3) 2009 DTSC Targeted Site Investigation, 4) 2014 Phase II Environmental Site Assessment to fill in gaps, 5) 2015 DTSC Targeted Site Investigation Phase II Report analyzed the entire Old Mill, 6) 2016 Removal Action Workplan completed and approved, 7) 2016 CEQA completed and RAW implementation approved.
8. Enforcement or Other Actions: There are no ongoing or anticipated environmental enforcement or other actions related to the brownfield site for which funding is south. There are no inquiries, or orders from federal, state, or local government entities that the applicant is aware of regarding the responsibility of any party (including the applicant) for the contamination, or hazardous substances at the site, including any liens.
9. Sites Requiring a Property-Specific Determination: No specific determination required.
10. Threshold Criteria Related to CERCLA/Petroleum Liability:
    a. CERCLA §107 Liability: The City of Mt. Shasta is not liable for contamination at the site under CERCLA §107.
        i. Exemptions to CERCLA Liability – ii. (1) Publicly Owned Brownfield Site Acquired Prior to January 11, 2002
        ii. How the Property was Acquired: Deeded by Roseburg Forest Products to City of Mt. Shasta
        iii. Date of Acquisition 1989
        iv. Timing and/or Contribution Toward Hazardous Substance Disposal: All disposal of hazardous substance at the site occurred before the acquisition of the property and the City of Mt. Shasta did not cause or contribute to any release of hazardous substances at the site. The City of Mt. Shasta has not arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.
        v. Pre-Purchase Inquiry: 1988
            - Preliminary assessments were conducted, and a preliminary clean-up plan was approved by the City of Mt. Shasta prior to deed transfer. Clean up plan included dismantling and removal of all structures and storage tanks by Roseburg Forest Products. Specific details regarding assessment types and performers is not known at this time.
        vi. Post-Acquisition Uses: No current official use. Intermittent unsanctioned use of the site by hikers/bikers and for other recreational purposes. Also, occasional intermittent unsanctioned use as an itinerant/homeless camp.
        vii. Continuing Obligations: No current methods are being employed to stop current releases and/or prevent any future releases. Police monitor the site to limit exposure to individuals on the property. The City of Mt. Shasta confirms its commitment to:
            - Comply with all land-use restrictions and institutional controls;
            - Assist and cooperate with those performing the cleanup and provide access to the property;
            - Comply with all informational requests and administrative subpoenas that have or may be issued in connection with the property; and
            - Provide all legally required notices.

b. Property Ownership Eligibility – Petroleum Sites: Not applicable

11. Cleanup Authority and Oversight Structures
    a. As demonstrated in previous grants, the City of Mt. Shasta plans to renew the Voluntary Cleanup Agreement as recommended by the State oversight program; through the California Department of Toxic Substance Control (DTSC). The experience gained from the ongoing work with EPA brownfields program in Mt. Shasta has built a high level of knowledge and expertise with staff and contractors. The City will consult with EPA, DTSC, and the Center for Creative Land Recycling (CCLR) for technical assistance when needed. The City also plans to obtain additional technical expertise by working with a subrecipient experienced in the management of Brownfield Grants and with Environmental Contractors that have knowledge on the conduct of cleanup activities. Procurement as documented in previous and current grants demonstrates the City is fully capable of meeting Good Faith practices, including 2 CFR 200.317-326.
    b. No additional access to neighboring properties will be necessary for this cleanup plan and the distance from neighboring residential areas is so large minimal impact is expected from cleanup activities at all.
12. Community Notification: The City of Mt. Shasta provided public notification of its intent to apply for Cleanup Grants with the EPA Brownfields Grant program on November 19th, 2019 and held a Regular City Council Meeting for the Public Hearing on November 25, 2019.
    a. Draft Analysis of Brownfield Cleanup Alternatives (ABCA) is attached as Appendix III.
    b. Community Notification Ad: The ABCA and grant application were available via the ongoing www.thelandingmountshasta.com/news and the City of Mt. Shasta Planning Commission websites. The Mt. Shasta City Hall served as the local repository with a draft available.
        i. The text on the Landing website read:

Public Meeting and Request for Comments on the Draft EPA Cleanup Application of The Landing – Roseburg Commerce Park

The City of Mt. Shasta is requesting public comments on the draft application and Analysis of Brownfield Cleanup Alternatives for Cleanup of The Landing – Roseburg Commerce Park. The grant application documents are available for review below and at the Mt. Shasta City Hall, located at 305 N. Mt. Shasta Blvd. Comments may be submitted below or provided at the regularly scheduled Mt. Shasta City Council Meeting on November 25th, 2019. Comments will be accepted until 5:00 p.m. on November 27th. The application will be submitted by the Dec. 3rd deadline.

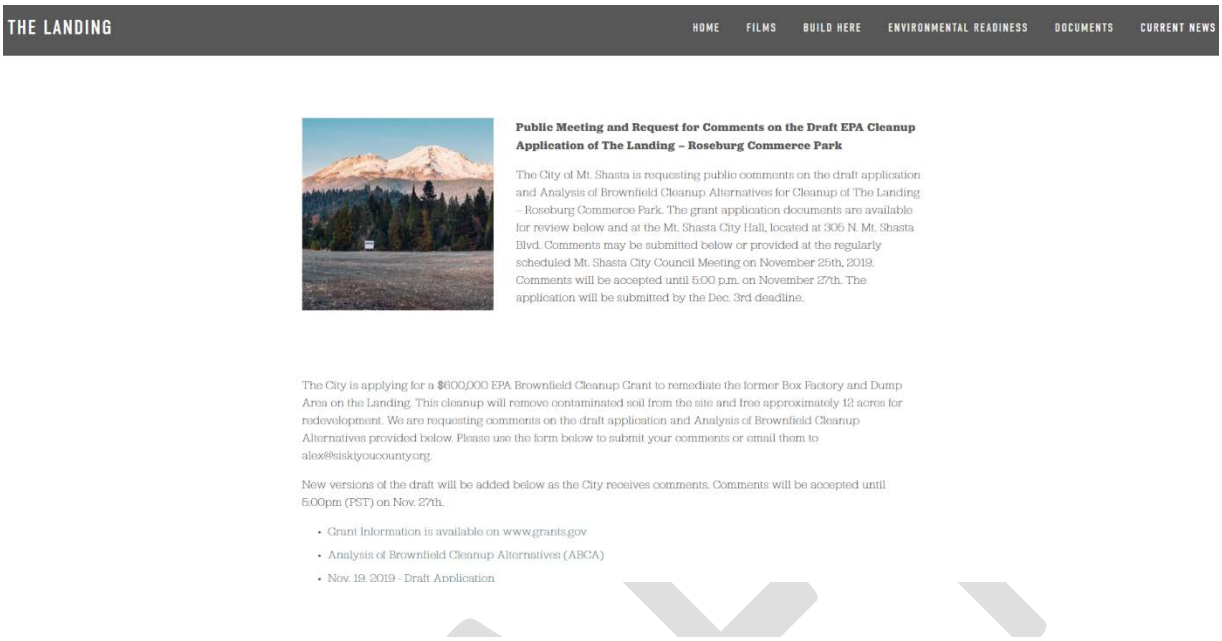
The City is applying for a $600,000 EPA Brownfield Cleanup Grant to remediate the former Box Factory and Dump Area on the Landing. This cleanup will remove contaminated soil from the site and free approximately 12 acres for redevelopment. We are requesting comments on the draft application and Analysis of Brownfield Cleanup Alternatives provided below. Please use the form below to submit your comments or email them to alex@siskiyoucounty.org.

New versions of the draft will be added below as the City receives comments. Comments will be accepted until 5:00 pm (PST) on Nov. 27th.

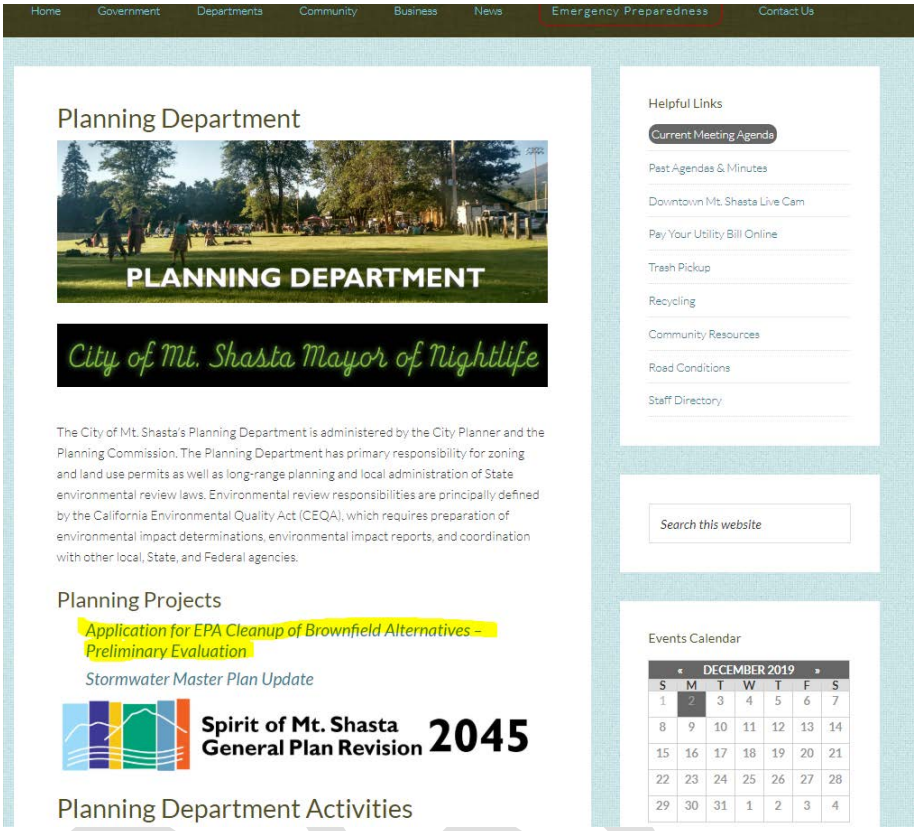
- Grant Information is available on www.grants.gov (Hyperlink to grant opportunity)
- Analysis of Brownfield Cleanup Alternatives (ABCA) (Hyperlink to ABCA)
- Nov. 19, 2019 - Draft Application (Hyperlink to Draft Application)

--- End Notification Text ---

ii. Below is an image of the notification on the Landing Project website and the online comment request:



iii. Below is an image of the notification on the City website at www.mtshastaca.gov/planning/



c. Public Meeting: The Public meeting occurred on Monday, November 25, 2019 at 5:30 pm at the Mt. Shasta City Park Upper Lodge, 1315 Nixon Rd. in Mt. Shasta, CA during a regularly scheduled Mt. Shasta City Council Meeting. The public comment on the draft application was Item number 9 on the agenda (snip below).

Page 61-95	9. The Landing Cleanup Brownfield Application Background: The City has been working towards the cleanup of the Roseburg property on the south end of the City with the goal to reuse the property as a mixed use development with various commercial businesses combined with associated recreational uses such as a recreational vehicle park and performing arts center. The Economic Development Council continues to work towards this goal through Brownfields cleanup efforts. Report By: Siskiyou Economic Development Council Recommended Council Action: Receive report, take public comment.

The draft application and ABCA was provided in the agenda packet from pages 61-95. A brief update of the project and draft application was presented prior to council opening the floor for public comment.

i. Public Meeting Comment: One received and summarized below.

Comment: "The Siskiyou Outdoor Recreation Alliance would like to be added to the list of partners. As exemplified in recent and ongoing projects, SORA has worked collaboratively with the City in Outdoor Recreation Stewardship throughout far Northern California. SORA has expertise in sustainable outdoor planning, outdoor recreation economics, community connectivity, collaboration, public stewardship of open space and trails, resource development, and interagency partnerships. SORA respectfully requests to be added into the partners section

of the application and be involved in the greenway and open space recreation reuse opportunities on the site once cleaned."

City Response: SORA was contacted the following morning to discuss partnership in the project. SORA was incorporated into the application and will be contacted once the site is cleaned and park spaces are delineated.

ii. Comments from Partners:

Comment Received via In-person Meeting with **Mt Shasta Recreation District**: "The Mt Shasta Recreation District is in full support of the application and would like to continue to be a partner regarding the greenway and recreation spaces. Our strategic plan has and will continue to include the Landing recreation opportunities as a potential partner for maintenance, expansion of services, and technical assistance when reuse occurs."

Comment Received via In-person Meeting with **SEDC**: "SEDC fully supports the City of Mt. Shasta's application for a brownfield cleanup of the Box Factory. This site has tremendous development potential not only because of its location within the region, but existing infrastructure, large size, and unparalleled views of Mount Shasta. This cleanup will remove the economic barrier of development by eliminating the intensified cost of contaminated soil transportation and disposal fees associated with disposal at a facility located over 450 miles away. This final cleanup effort combined with financial incentives currently being developed under the EDA grant should secure reuse within the next 2-5 years. We are available to assist the City with any technical expertise in economics and brownfield grant management."

Comment Received via **Discover Siskiyou**: "As the Tourism Business Improvement District representative for Siskiyou County, Discover Siskiyou fully supports the City's EPA Brownfield Cleanup Application and reuse plans. The area surrounding Mt. Shasta has many outdoor possibilities, including skiing, hiking, fishing, mountaineering, kayaking, bird-watching, and more. All these activities are served by local businesses that provide gear and recreation information. The Landing has many opportunities to tap into the tourism market via lodging, park space, and complimentary business potential. Discover Siskiyou would be happy to support new recreation, lodging, and businesses via marketing within the tourism industry as the site is redeveloped."

iii. Meeting and Comment Summary:

The public meeting was attended by approximately 15 individuals. Council discussed financial cost of cleanup, transportation fees, and the timeline for redevelopment. Council was in full support of the project and hopes this final funding opportunity for brownfield cleanup at the Landing will result in reuse within the upcoming years. A single comment as noted above was provided during the open public comment meeting. Additional comments were collected via phone or one-on-one meetings.

Since the first EPA brownfields assessment in 2007, the City provides routine project updates at City Council, during office hours, at regular planning commission meetings, and online via the Landing website. The Area-wide plan, The Landing Specific Plan, Analysis of Brownfields Alternatives, and CEQA process have incorporated public comments for over 10 years. Residents routinely reiterate the desire for economic prosperity and a balance for the protection of the City's natural resources and open spaces.

d. Submission of Community Notification Documents: The documents are attached as in Appendix II as illustrated below.

Item Name	Heading	Section
Copy of ABCA	Appendix III	n/a

Copy of the Ad	Appendix II	12.b.i-iii
Comments & Response	Appendix II	12.c.i-ii
Meeting and Comment Summary	Appendix II	12.c.iiii
Meeting Sign-In Sheet	Appendix IV	n/a

13. Statutory Cost Share:
    a. The City of Mt. Shasta is requesting a hardship waiver for the cost share and has attached the required document to this application. However, if the City is denied cost share, the City is capable of providing cost share via in-kind contributions and materials. Per task 1 for programmatic requirements, the City will provide cost share via direct staff time, supplies, and through required monetary requirements to DTSC via the oversight program. Per Task 2 for Community Outreach, the City will meet cost share requirements by providing a venue, in-kind staff time for development of presentation materials, stakeholder engagements, and supplies. Per Task 3 for Cleanup Implementation, the City may contribute materials such as backfill and labor for cleanup efforts including the grading permit and/or land use implementation and development of a soil management plan. The remaining cost share is attributed to personnel, supplies, and a contribution for contractual management for reporting in Task 5. These details are further explored in the Narrative on pages 9-11.
    b. The Hardship Waiver Request is attached as Appendix V.

APPENDIX III – THRESHOLD CRITERIA RESPONSE 12.A - ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES (ABCA)

The Landing – Mt. Shasta Commerce Park
South Mt. Shasta Boulevard
Mt. Shasta, California

Prepared By:
City of Mt. Shasta
305 N. Mt. Shasta Boulevard
Mt. Shasta, California 96067

I. EXECUTIVE SUMMARY

The location of the proposed Mount Shasta Commerce Park (also referred to as The Landing) (Figure 1) historically operated as a lumber mill and box factory from 1900 to 1985. The site was originally developed by the Pioneer Box Factory and after several changes in ownership was finally owned and operated by Roseburg Forest Products. The property, which is currently a vacant lot, will be developed by the City of Mt. Shasta to include various commercial businesses and recreational facilities, including a performing arts center. Current environmental concerns at the site include contaminated surface and subsurface soil which likely occurred during historical lumber mill operations. Contamination is primarily concentrated in areas of historical site facilities, including a former equipment shed, a dip tank for treating lumber products, and a former debris dump area (Figure 2). Additionally, contaminated soil has been identified in the vicinity of the former box factory located on the property. The box factory operated power transformers and also a burner which have impacted surface and shallow soil with various contaminants. Contaminants of concern (COC) present in soil at specific areas of the property do currently exceed state and federal regulatory standards for human health. The purpose of the proposed environmental cleanup at the site is to remedy the environmental impacts to the soil to ensure the protection of human health and the environment. The proposed remedy for the site includes both the excavation and removal of the impacted soil from the site and in areas where excavation and removal of soil is not economically feasible the soil will be covered and contained to prevent human contact (Figure 3).

II. INTRODUCTION AND BACKGROUND

a. Site Location

The site is located on South Mt. Shasta Boulevard in the southern portion of the City of Mt. Shasta, Siskiyou County, California and is bordered by a residential area to the north, Interstate 5 to the west, and a mixture of residences, business parcels, and forest to the south and east (Figures 1 and 2).

b. Previous Site Use(s) and any previous cleanup/remediation

The property was formerly used primarily for lumber milling and log storage. A lumber mill was originally located in the Old Mill area at the northern end of the site. A more recently constructed lumber mill (New Mill) was located in the central portion of the western property.

Former facilities in the New Mill study area included a pentachlorophenol (PCP) dip tank for wood treatment, diesel fuel aboveground storage tank (AST), gasoline fuel underground storage tank (UST), dump area, and an equipment maintenance shed. The AST and UST, while requiring additional assessment, will not be addressed as part of the described cleanup activities. The AST and UST will be addressed at a later date. Southwest of the New Mill facilities is a former box factory, which previously contained a planing mill, a burner, and transformers.

The presence of PCP in shallow soil in the vicinity of the former dip tank was the likely result of spills which occurred over the duration of site operations. Historical documentation has stated that the former dip tank was cleaned three times per year and the rinsate may have been discharged directly to the ground surface. Historical releases of Total Petroleum Hydrocarbons (TPH) in the New Mill area have primarily been the result of spills over the duration of site operations. TPH in the vicinity of the former equipment shed has historically been observed as surface staining suggesting liquids were spilled from containers and/or equipment. No historical documentation was found explaining the release of TPH in the vicinity of the dump area, gasoline UST, or the diesel AST. The UST and AST were removed from the site prior to 1987.

Polychlorinated biphenyls (PCBs) have historically been reported in soil samples collected near the transformers and dioxins/furans have been identified in soil at the former burner location.

The operational and assessment history of the site is outlined below:

1900: The property was first developed by the Pioneer Box Company.

1928: Mount Shasta Pine Manufacturing Company purchased the property.

1954: Property acquired by the Ralph L. Smith Lumber Company (Smith Lumber).

1963: Kimberly-Clark Corporation purchased the property.

1979: Roseburg Forest Products (RFP) purchased the property.

1985: RFP ceased all operations on property and subsequently moved equipment to other facilities.

1998: E&E conducted a Brownfields Targeted Site Investigation (TSI) for the EPA, which involved collecting soil, sediment, surface water, and groundwater samples. Fifteen areas of potential contamination were identified based on available historical information. Analytical results indicated that additional investigation was warranted at four of the 15 areas where samples were collected. These included the New Mill dip tank and the Old Mill dip tank. A sample collected at the dump reported diesel fuel at 2,250 mg/kg. A soil sample collected from 1 ft bgs from the transformer area of the former box factory reported a polychlorinated biphenyls (PCB) (Aroclor-1260) at a concentration of 0.120 mg/kg.

2005: E&E conducted a second Brownfields TSI to delineate the previously identified areas of contamination. PCP contamination was confirmed in soil and groundwater at the Old Mill dip tank and at the New Mill dip tank. However, the vertical and lateral extent of the PCP groundwater contamination was not delineated in these areas.

February 15, 2007: URS collected soil samples for PCB analysis from the box factory transformer area in December 2006 and again in February 2007. Additional soil sampling was conducted during this phase of the TSI to define the appropriate excavation area and depth for remediation of this location.

November 11-14, 2014: TRC conducted a soil and groundwater site investigation of the New Mill, including the former equipment shed, former dip tank, dump area in accordance with the Sampling and Analysis Plan (SAP) approved by the EPA and DTSC. A soil investigation was also conducted at the former transformer and former burner areas of the Box factory.

c. Site Assessment Findings

Significant detections of contaminants are discussed below. Refer to Table 1 for the current federal human health standards for comparison to detections of contaminants found at the site.

1. Equipment Shed Area

In November 2014, TRC completed soil borings to a depth of 15 ft bgs at the former equipment shed to further delineate the presence of TPH as diesel, TPH as gasoline, and TPH as motor oil in shallow soil. The locations represented areas that had elevated TPH detections during past assessments or had not been previously sampled. The highest TPH as diesel concentration in soil observed in the equipment shed area was 3,100 mg/kg in sample EQSH-5-7.5. The highest TPH-mo concentration in soil observed in the equipment shed area was 7,400 mg/kg. TPH-g was not detected above the investigation screening level.

In December 2006, the City completed an excavation (identified as Pit 5), which primarily targeted stained surface soils adjacent to the equipment shed. Sample depths from 2007 equipment shed soil samples range from surface to 2 ft bgs. Historical concentrations of TPH as diesel in soil samples from the equipment shed area have ranged from 3.8 mg/kg to 12,000 mg/kg. Historical concentrations of TPH as motor oil in soil samples from the equipment shed area have ranged from 47 mg/kg to 34,000 mg/kg. No PCP has been detected in historical soil samples from the equipment shed area.

2. Dump Area

In November 2014, TRC completed soil borings to a depth of 15 ft bgs at the New Mill dump area to delineate the vertical extent of TPH as diesel, TPH as gasoline, and TPH as motor oil impacts in soil. The TPH as diesel maximum concentration detected was 310 mg/kg. The TPH as motor oil maximum concentration detected was 3,400 mg/kg at. No TPH as gasoline detections were detected.

Historical soil analytical data from the former dump and surrounding area includes sampling from May 1998, December 2006, February 2007, and May 2007. TPH as diesel and TPH as motor oil were detected at elevated levels in shallow soil, with a maximum TPH as diesel concentration of 2,250 mg/kg (May 1998) and a maximum TPH as motor oil concentration of 1,900 mg/kg (February 2007).

Historical metal detections above the current U.S. EPA Regional Screening Levels (RSLs) for shallow soil within the dump area include only arsenic, which was detected above the RSL of

0.25 mg/kg in two soil samples. The highest historic arsenic detection in shallow soil at the dump area is 0.78 mg/kg from a surface soil sample.

3. Former New Mill Dip Tank

In November 2014, TRC completed soil borings to a depth of 15 ft bgs to investigate the vertical extent of PCP in soil. Additionally, the soil samples from the dip tank were analyzed for TPH and metals. There were no detections of PCP or any other analytes over the laboratory reporting limit.

Historical soil analytical data from the former dip tank and surrounding area includes samples from May 1998, March 2005, and May 2007. Sample depths from the dip tank area range from surface to 10 ft bgs. Historical detections of COCs include one (1) detection of TPH as diesel and multiple detections TPH as motor oil and PCP. Historical concentrations of TPH as diesel and TPH as motor oil in shallow soil have all been below current RSLs. Historical concentrations of PCP in shallow soil have ranged from <0.020 mg/kg to 340 mg/kg. Six (6) soil samples from the former dip tank area have exceeded the current RSL of 2.7 mg/kg for PCP.

Metals detected above both current RSLs and background concentrations in shallow soil within the dip tank area include only arsenic, which was detected above the RSL of 2.4 mg/kg and the maximum background concentration of 2.4 mg/kg in two (2) historical soil samples. The highest historical arsenic detection at the dip tank area in shallow soil (1 foot bgs) is 5.1 mg/kg.

4. Former Box Factory Transformer Area

In November 2014, TRC completed soil borings to a depth of 15 ft bgs to investigate the lateral and vertical extent of PCBs in shallow soil that were detected during previous investigations. There were no detections of PCBs over the method detection limit.

Historical soil analytical data from the former transformer area includes shallow soil samples from May 1998, surface soil samples from December 2006, surface soil samples from February 2007, and surface soil samples from May 2007. Historical investigations of the transformer area have primarily addressed polychlorinated biphenyls (PCBs) and metals in shallow soil. Historical detections of the PCBs Aroclor 1254 and Aroclor 1260 have been relatively low; however, two (2) historical soil samples have exceeded the current RSL of 1.0 mg/kg for Aroclor 1254 and Aroclor 1260 in shallow soil.

5. Former Box Factory Burner

In November 2014, TRC completed soil borings to a depth of 15 ft bgs in the vicinity of the former Box Factory burner to investigate dioxins and furans in shallow soil. Four (4) soil samples exceeded the U.S. EPA screening level of 22 pg/g. The maximum 2,3,7,8 -TCDD toxic equivalency concentration (TEQ) detected during the investigation was 272.76 pg/g.

Historical soil analytical data from the former burner area includes one (1) surface soil samples from May 1998 and three (3) surface soil samples from December 2006. Analysis of soil during historical investigations has been limited to dioxin and furan analysis and suggests that minor dioxin and furan impacts to shallow soil are present. Three samples from the December 2006 soil investigation had TCDD Toxic Equivalency Concentrations (TEQ) that exceed the current

November 2013 USEPA RSLs. This impacted soil appears to be limited in size and likely confined to shallow soils.

d. Project Goal

The planned reuse for the property is a mixed use development with various commercial businesses combined with associated recreational uses such as a recreational vehicle park and performing arts center.

III. Applicable Regulations and Cleanup Standards

a. Cleanup Oversight Responsibility

The site remedial action will be conducted under the oversight of the California Department of Toxic Substances Control (DTSC). The DTSC signed a Voluntary Cleanup Agreement (VCA) with the City on July 3, 2013, to provide project oversight. TRC was retained by the SCEDC and the City to address environmental issues at the site.

b. Cleanup Standards for Major Contaminants

The U.S. EPA RSLs for industrial site soils (U.S EPA, 2015) will be used as cleanup goals for the site. RSLs are risk-based concentrations derived from standardized equations combining exposure information assumptions with EPA toxicity data. RSLs are considered by the U.S. EPA to be protective for humans (including sensitive groups) over a lifetime. RSLs provide long-term targets to use during the analysis of different remedial alternatives (U.S. EPA, 2015). Refer to Table 1 for the RSLs for contaminants found at the site.

c. Laws & Regulations Applicable to the Cleanup

Laws and regulations that are applicable to the portion of this cleanup that is being funded by the EPA Brownfields grant include the Federal Small Business Liability Relief and Brownfields Revitalization Act, the Federal Davis-Bacon Act, State of California environmental law, City of Mt. Shasta and Siskiyou County by-laws. Federal, state, and local laws regarding procurement of contractors to conduct the cleanup will be followed.

Prior to conducting the site remediation activities all approvals associated with the California Environmental Quality Act (CEQA) will be obtained including biological resource and cultural resource approvals.

Prior to conducting any soil removal activities, all appropriate permits will be obtained from both City and County agencies. All soil excavation areas will be marked with white paint or staked according to Underground Services Alert (USA) requirements. At least two days prior to commencing work at the site, USA will be notified.

IV. Evaluation of Cleanup Alternatives

a. Cleanup Alternatives Considered

The remedial alternatives analysis identification process focuses on several options that exhibit the potential to eliminate or significantly reduce exposure to the COCs observed in shallow soil at the site and are most likely to achieve a permanent or temporary solution.

The following remedial alternatives are evaluated for effectiveness and implementation with respect to current site conditions.

1. Option 1 – No Action

No Action assumes no additional efforts are undertaken to eliminate potential future exposures to surface and subsurface soil impacts at the site. It appears that this technology would not eliminate risk to human health or the environment. Additionally, no action could impair the property from a financing and redevelopment perspective.

2. Option 2 – Use Restrictions/Institutional Controls

Institutional controls establish restrictions on the use of a site that would otherwise result in exposure to the COCs that remain. Restrictions can be in the form of allowed uses and controls and also physical barriers such as fences. This would require the filing of a deed restriction in the form of an Activity and Use Limitation (AUL). The current use of the site is a vacant lot and anticipated future use of this site is for various commercial businesses combined with associated recreational uses. In order to achieve a condition of No Significant Risk (NSR), certain uses of the site would need to be restricted.

The objectives of the AUL would include the following:

- Restrict direct contact with the historic fill material;
- Restrict vegetable cultivation;
- Require maintenance of pavement areas and landscaping;
- Restrict use of property for single-family residential use, unpaved playgrounds, parks, and daycare facilities unless additional exposure mitigation is conducted; and
- Restrict access to the historic fill material unless supervised by an environmental professional utilizing a Soil Management Plan.

Institutional controls have been retained for consideration in the development of remedial alternatives for soil and groundwater.

3. Option 3 – Use Restrictions/Institutional Controls with Containment

Containment measures are designed to isolate chemicals to prevent direct contact, erosion, and potential chemical leaching. The alternative of excavating soil can be difficult based on site conditions and can also be prohibitively expensive, particularly when the volume of impacted soil is large as is the case at the New Mill dump area. Capping generally provides a cost-effective and proven method of containment for managing large volumes of impacted soil where related groundwater issues are not also present.

A containment remedy could consist of a layer of soil, asphalt, concrete, or other containment technology consistent with site development plans which will eliminate or minimize direct

contact with the underlying soils, and will address all chemicals. When containment is selected for a remedial solution, it is implemented in conjunction with an institutional control that would require cap maintenance and prohibit uncontrolled cap removal or penetration. Containment is retained as a remedy for further consideration in the detailed evaluation.

4. Option 4 – Excavation and Off-Site Disposal

Physical removal addresses COCs in soil by physically removing impacted media from the site with disposal or recycling at an appropriately licensed off-site facility. Excavation and off-site disposal is a proven and commonly used method that addresses all contaminants. This remedy will effectively remove soil that exceeds human health standards. This alternative often targets small volumes due to the increased costs associated with excavation, transportation, and disposal fees. Given the proven performance of excavation as a site remedy at similar sites, this technology will be retained for further evaluation.

Removed soil volumes presented below are estimates based on field observations and analytical data obtained to date and are presented as in-place volumes. Further refinement of soil volume estimates by additional soil sampling and/or inspection may be warranted. Proposed areas for soil excavation and removal are presented in Figure 3.

The proposed excavations at the site are discussed below:

i. *New Mill Equipment Shed*

The New Mill equipment shed, located along the eastern portion of the site along South Mt. Shasta Boulevard, consists of a total area of approximately 7,275 square feet that exceeds proposed cleanup levels for TPH. Approximately 5,127 square feet will be excavated to a depth of 1 ft bgs. Approximately 1,092 square feet will be excavated to a depth of 3 ft bgs. Lastly, approximately 1,056 square feet will be excavated to a depth of 8 ft bgs. The in-place volume of TPH impacted soil in this area is estimated to be 623 cubic yards. Excavated areas with depths of 3 ft bgs and 8 ft bgs will be backfilled to grade with clean backfill material.

ii. *Box Factory Transformer Area*

The Box Factory transformer area, located on the southern portion of the Site, consists of a total area of approximately 1,362 square feet that exceeds proposed cleanup levels for PCBs. The entire remediation area for the transformer area square feet will be excavated to a depth of 1 ft bgs. The in-place volume of PCB impacted soil in this area is estimated to be 50 cubic yards.

iii. *Box Factory Burner*

The Box Factory burner area, located along the southern portion of the site, consists of a total area of approximately 4,561 square feet that exceeds proposed cleanup levels for dioxins and furans. Approximately 3,880 square feet will be excavated to a depth of 1 ft bgs. Approximately 681 square feet will be excavated to a depth of 3 ft bgs. The in-place volume of dioxin and furan impacted soil in this area is estimated to be 219 cubic yards. Excavated areas with depths of 3 ft bgs will be backfilled to grade with clean backfill material.

b. Comparison of Cleanup Alternatives

1. Effectiveness

Remedial Option #4 is the most effective means to mitigate exposure from site COCs as impacted material is removed from the site. Remedial Option #3 is also effective in mitigating exposure to COCs but does not remove COCs from the site. Remedial Options #1 and #2 are considered the least effective.

Remedial Option #4 is more reliable than the other remedial options in preventing exposure to future users of the site because the COCs in soil are removed from the site entirely. Due to the relatively simple nature of design and construction, there is low potential for failure associated with Remedial Option #4. The degree of certainty that Remedial Option #3 would be successful is dependent on maintenance of engineering controls that would need to be implemented.

2. Difficulty of Implementation

Since the site is currently a vacant lot with small areas of concrete foundations, excavation and off-site disposal of targeted soil is relatively easy to implement. However, Remedial Option #4 would become more difficult to implement in areas where large amounts of soil would require excavation, such as the New Mill dump area.

The implementation of remedial Option #3 would be difficult due to the engineering that would be required to stabilize site soils, including areas of steep slopes or inadequately compacted soil. The containment cap would require engineering to ensure lasting protection from the underlying soil.

3. Cost Effectiveness

Depending on the area of the site, the overall cost to implement Remedial Option #3 is less than Remedial Option #4 due to the costs associated with excavating, soil transportation and disposal, and backfilling. However, in smaller areas, such as the New Mill equipment shed and the Box Factory, excavating soil would be more cost effective in the long term because the COCs would be removed and an AUL and its associated engineering and maintenance would not be required. An implementation of an AUL is more cost effective way to manage exposure to site COCs where the volume of impacted soil is large, such as the New Mill dump area.

4. Potential Risks

The potential short-term and long-term risks associated with each alternative are considered low to moderate. Potential short-term risks associated with soil excavation/disposal include possible accidental spills of contaminated soil during soil transport, which could result in short-term exposure to the contaminated soil by surrounding human populations. However, any accidental spill of contaminated soil would be immediately cleaned-up, and therefore, the duration of any potential human exposure to the contaminated soil would be extremely short-term. Prior to site activities a Spill Prevention, Control, and Countermeasure Plan (SPCC) will be developed and will be kept onsite during work activities. The short term risks for no-action or the sole use of an AUL would be considered moderate to high, due to concerns over worker health and safety during redevelopment of the site.

5. Cost Estimate

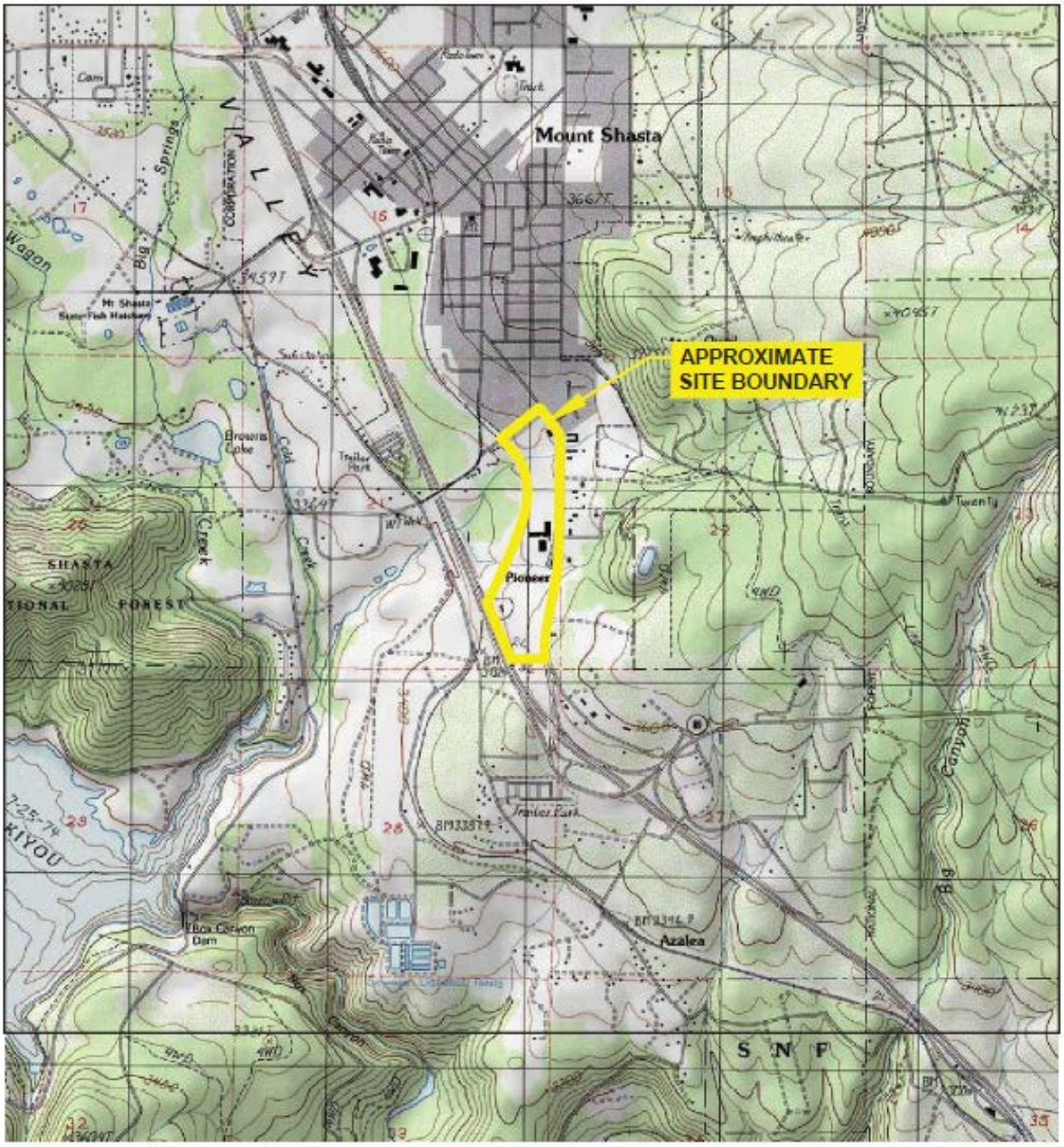
- For Option #1, there would be no costs;
- For Option #2, there would be administrative costs associated with applying a deed restriction to specific areas of the site. Additional costs would include a property survey by a professional surveyor and regular monitoring of the site's institutional controls to ensure compliance and ensure protection to human health. The cost to implement this option could be highly variable depending on the final development plans for the property, which are currently uncertain.
- For Option #3, total costs would include the costs associated with Option #2 in addition to costs for applying a soil containment technology to specific areas of the site. The application of a containment technology (e.g. asphalt or concrete parking surfaces) would likely be conducted concurrently with development of the property and would be paid for by property development funds. The option would also include regular monitoring of the containment technology to ensure its integrity. The cost to implement this option could be highly variable depending on the final development plans for the property, which are currently uncertain.
- For Option #4, the estimated costs are $197,383. This estimate includes costs for an excavation subcontractor to excavate and dispose of site soils at a certified disposal facility. The estimate also includes field oversight by an environmental consultant and confirmation soil sampling and analysis costs.

c. Recommended Cleanup Alternative

Due to the large size of the property and the various environmental conditions at each area of the property, a combination of options will be employed to most effectively remediate the property. Remedial Options #3 and #4 are the best selections as targeted removal of soil and an implementation of a soil containment technology along with an AUL are anticipated to achieve NSR in a relatively efficient manner. While Remedial Option #4 (Excavation and Off-Site Disposal) will be the primary remedy for most of the impacted areas, Remedial Option #3 (Use Restrictions/Institutional Controls with Containment) is proposed for the former dump area due to its size and the economic limitations of excavating and removing soil from such a large area.

Appendix A

Site Figures



APPROXIMATE SCALE (MILES)

1.5 1.0 0.5 0.25 0 0.25 0.5 1.0 1.5

N

SOURCE:
United States Geological Survey
7.5 Minute Topographic Maps:
City of Mount Shasta Quadrangle, California

VICINITY MAP

The Landing - Mt. Shasta Commerce Park
Mount Shasta, California

TRC | 202311 | **FIGURE 1**

FILENAME: N:\PROJECTS\CAD\Roseburg Lumber Mill_Mt Shasta\Fig1_Vicinity Map.dwg | Layout Tab: 8x11

Legend

Former Industrial Area (approx.)

Figure 2
Site Plan
The Landing - Mt. Shasta Commerce Park
Mt. Shasta, California

N

0 175 350 Feet

1 in = 175 ft

TRC
Results you can rely on

Service Layer Credits: © 2015 Microsoft Corporation

Legend

Former Industrial Area (approx.)

Figure 3
Removal Action Work Plan
The Landing - Mt. Shasta Commerce Park
Mt. Shasta, California

N

0 175 350 Feet

1 in = 175 ft

Service Layer Credits: © 2015 Microsoft Corporation

TRC
Results you can rely on

Appendix B

Site Tables

Table 1
Proposed Site Cleanup Levels
Removal Action Work Plan
The Landing - Mt. Shasta Commerce Park
Mt. Shasta, California

Contaminant of Concern (COC) in Soil		Industrial Soil Standards (USEPA RSLs, January 2015) (mg/kg)
Total Petroleum Hydrocarbons (TPH)	Gasoline	420 (Aromatic)/ 2,200 (Aliphatic)
	Diesel	600 (Aromatic)/ 440 (Aliphatic)
	Motor Oil	3,300 (Aromatic)/ 3,500,000 (Aliphatic)
Pentachlorophenol (PCP)		4
Polychlorinated Biphenyls (PCB)	Aroclor 1016	30
	Aroclor 1221	0.66
	Aroclor 1232	0.66
	Aroclor 1242	1
	Aroclor 1248	1
	Aroclor 1254	1
	Aroclor 1260	1
Dioxins and Furans	2,3,7,8-TCDD TEQ	22 pg/g

Notes
mg/kg = milligrams per kilogram
pg/g = picograms per gram
TEQ = Toxic Equivalency Factor

APPENDIX IV – THRESHOLD CRITERIA RESPONSE 12. C - COMMUNITY MEETING SIGN-IN SHEET

REQUEST TO SPEAK AT MEETING

Meeting: City Council Reg Mar Meeting

Date: 11/25/2019

AGENDA ITEM NUMBER	NAME (PLEASE PRINT)	ADDRESS	INSIDE CITY LIMITS	OUTSIDE CITY LIMITS	EMAIL ADDRESS
10 ✓	Valerie Lashbaugh	304 Sheldon Ave	yes		
9 ✓	Laurel Markwell ✓	1704 Holiday Lane, MS		yes	laurel@siskiyou outdoor [illegible] alliance.org
10 ✓	Kevin Hamm	402 Ackley Av	Yes		
10 ✓	Stanley Grabowski	513 Monticello Dr	YES		[illegible]
10 ✓	Eric Lashbaugh	304 Sheldon Ave	YES		
10 ✓	John Kennedy	709 Rockfellow Dr ✓			[illegible]

If you wish to address the Council regarding a matter within their jurisdiction, but you do not wish to sign up on this form, please announce your request to speak either during the Public Comment portion of the Agenda for those matters not on the Agenda or when the Mayor opens the meeting to public comments for items already listed on the Agenda.

APPENDIX V – THRESHOLD CRITERIA RESPONSE 13.B - HARDSHIP WAIVER REQUEST

The City of Mt. Shasta is requesting a hardship waiver for the cost share requirement. The closing of the Landing in 1985 and the recession that began in 2008 lead to the closure of several critical businesses and a loss of local employment opportunities. Loss of the timber industry has left residents of Mt. Shasta with few alternatives to employment and the recession exacerbated this issue. When the mill closed in 1985, local unemployment rose to >25% due to associated economic multipliers. Further, at the peak of the 2008 recession, regional unemployment was 16.6%. High unemployment and few jobs resulted in low wages, particularly for younger wage earners. In 1985 the starting wage for a "production" job in the timber mill was approximately $30/hour (adjusted for inflation), significantly higher than the $18.17/hour starting wage available currently for a similar position (with fewer openings). Further, most job opportunities only pay current state minimum wage of $9/hour to start. Due to this wage erosion, younger workforce populations have largely emigrated away from Mt. Shasta area. This is demonstrated by the significant reduction of the 15-30-year-old demographic from 19.1% in 1985 to 15.7% in 2013. Unfortunately, these trends have resulted in high poverty, an aging workforce, substance abuse issues, declining school enrollment, and youth emigration.

Since 1985, the region has slowly shifted to a service-based economy oriented towards tourism but endured chronic unemployment, low wages and high poverty that have been up to twice the national average in Siskiyou County as well as Mt. Shasta. As a rural community with a small population, Mt. Shasta has not been able to tap into the dollars and resources available to larger population centers. Currently, the total working populous ages 16 and over is 2,757. Even with a 4.5% unemployment rate (higher than both state and national averages), the average per capita income is below the poverty level at $26,842. A relatively high percentage of residents in Mt. Shasta have disabilities (24%) or require public income assistance (11.9%) compared to the national average. The lack of appropriate land for development due to brownfields and surrounding Federal lands impedes prosperity for the community of Mt. Shasta. Mt. Shasta has a 15% commercial vacancy rate for many years according to City Planning officials, which depresses the local economy and hurts property values of nearby businesses. Adding to these issues, the proximity of the Oregon border often sends businesses or customers north for zero sales taxes incentives, which further damages the city's tax base and is an impetus for developing local businesses that will competitively supply local needs.

In addition to these economic hardships, the City's location is vulnerable to regular natural disasters. The City of Mt. Shasta faces an annual fire threat during the dry months and frequently experiences severe winter weather further exacerbating the need for beneficial development projects. In January (DR-4301) and February (DR-4308) of 2017, the Federal Emergency Management Agency (FEMA) declared the area as a natural disaster location with the need of external funding for recovery. In January 2017, snowfall exceeded 4 feet causing damage from the debris fall and flooding causing permanent damage to city streets and drainage systems with an estimated $1 million cost to the city.

Funds generated through increases in general funds, fees, sales/property/special taxes, or assessments are extremely difficult to obtain due to the small populations and smaller number of local businesses. Mt. Shasta is forced to focus solely on basic services for schools, fire, and policy (public safety and infrastructure) and seek alternative funding for community and economic development activities. Mt. Shasta is struggling with a small staff, layoffs due the recession, and loss of tax base due to abandoned properties. While still attempting to recover from the recent disasters, we do not have the resources or tax base to fund Brownfields activities. The City does have investors, a willingness to apply for leveraged funds, and businesses interested in The Landing, but is desperate for cleanup to allow investment to truly begin.

Sources: 2013-2017 U.S. Census Bureau – American Community Survey 5-Year Estimates

OMB Number: 4040-0004
Expiration Date: 12/31/2019

Application for Federal Assistance SF-424

* 1. Type of Submission:
- [ ] Preapplication
- [x] Application
- [ ] Changed/Corrected Application

* 2. Type of Application:
- [x] New
- [ ] Continuation
- [ ] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received: 12/03/2019

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: City of Mt. Shasta

* b. Employer/Taxpayer Identification Number (EIN/TIN):

* c. Organizational DUNS: 0703158900000

d. Address:

* Street1: 305 N Mt. Shasta Blvd.

Street2:

* City: Mt. Shasta

County/Parish: Siskiyou

* State: CA: California

Province:

* Country: USA: UNITED STATES

* Zip / Postal Code: 96067-2231

e. Organizational Unit:

Department Name: Planning

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

* First Name: Juliana

Middle Name: Grace

* Last Name: Lucchesi

Suffix:

Title: City Planner

Organizational Affiliation: City of Mt. Shasta

* Telephone Number: 5309267517

Fax Number:

* Email: jlucchesi@mtshastaca.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

*** 12. Funding Opportunity Number:**

EPA-OLEM-OBLR-19-07

* Title:

FY20 GUIDELINES FOR BROWNFIELD CLEANUP GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Box Factory EPA Brownfield Cleanup at The Landing – Roseburg Commerce Park

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: CA-001 * b. Program/Project: CA-001

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 09/01/2020 * b. End Date: 10/31/2023

18. Estimated Funding ($):

* a. Federal	600,000.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	600,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .

☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name: Bruce

Middle Name:

* Last Name: Pope

Suffix:

* Title: City Manager

* Telephone Number: 5309267510 Fax Number:

* Email: bpope@mtshastaca.gov

* Signature of Authorized Representative: Muriel A Howarth Terrell * Date Signed: 12/03/2019